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AMAZON.COM, INC.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MASTEROBJECTS, INC.,

Plaintiff,

v.

AMAZON.COM, INC.,

Defendant.

Case No. 3:20-cv-08103-WHA

**JOINT STIPULATED REQUEST AND
~~PROPOSED~~ ORDER TO CHANGE
TIME PER CIVIL L.R. 6-2**

Discovery Master: Harold J. McElhinny

Complaint Filed: May 5, 2020

Trial Date: October 17, 2022

1 Plaintiff MasterObjects, Inc. (“MasterObjects”) and Defendant Amazon.com, Inc.
 2 (“Amazon”), pursuant to Civil Local Rules 6-2 and 7-12, jointly submit this stipulated request for an
 3 order changing time as follows:

4 WHEREAS the Discovery Master set an April 8, 2022 deadline for the production of
 5 documents by MasterObjects. *See* Special Master’s Order and Report (ECF 304);
 6

7 WHEREAS MasterObjects and Amazon have been in contact with third-party Google LLC’s
 8 in-house counsel with respect to Google material in MasterObjects’ litigation counsel’s possession,
 9 which was designated by Google under a protective order in a prior case and/or filed or submitted
 10 under seal in a prior case;

11 WHEREAS MasterObjects has been in contact with third-party Unified Patents LLC’s
 12 outside *IPR* counsel with respect to Unified material in MasterObjects’ *IPR* counsel’s possession,
 13 which was designated by Unified under a protective order in a prior *IPR* and/or filed or submitted
 14 under seal in a prior *IPR*;
 15

16 WHEREAS MasterObjects’ litigation counsel continues to seek clarity with respect to
 17 whether a particular document is part of the *Unified IPR* record and whether it is subject to any
 18 restrictions;
 19

20 WHEREAS the parties and the third parties continue to meet and confer with respect to
 21 potential redactions to the above identified materials or the need for the third parties to seek a
 22 protective order from this Court if agreements cannot be reached;

23 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, and
 24 subject to approval by the Court that: MasterObjects’ deadline to produce the above identified
 25 material is extended by two weeks to April 22, 2022, by which time MasterObjects will produce the
 26 material absent a party agreement(s), the filing of a protective order(s), or a court order(s).

27 Dated: April 7, 2022

28 /s/ Darrell R. Atkinson

/s/ Thomas B. King

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ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Date: April 7, 2022

/s/ Darrell R. Atkinson
Darrell R. Atkinson

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS ORDERED.

Date: April 7, 2022.

/s/ Harold McElhinny

Harold J. McElhinny
Discovery Master